

REMARKS

The Office Action dated November 20, 2002 has been received, its contents carefully noted, and the applied citation thoroughly studied. Accordingly, the foregoing revisions to the specification and claims are tendered with the conviction that patentable contrast has now been made manifest over the known prior art. Accordingly, all rejections tendered by the Examiner in the above-referenced Office Action are hereby respectfully traversed and reconsideration is respectfully requested.

Figure 5 of the drawings is modified subject to the Examiner's approval to include the objected to missing reference numerals.

The text and claim 16 have been modified to conform to the Examiner's perception of correctness.

Claim 13 has been amended to extinguish the Examiner's perceived over breadth concerns and claims 13 and 14 are amended to specify patentable subject matter beyond any residual doubt capable of being reasonably entertained by the Examiner.

The Examiner's reliance on Morrow ('820) is misplaced. The standard for obviousness articulated and applied by the Examiner is legally incorrect. Morrow is not the least concerned with dedicating an individual reel of a series to an individual wheel of a series such that each reel enables its respective wheel.

Morrow - not the Examiner - is the arbiter of that which is within the scope of that patent. Morrow provides written guidance for permissible "variations and modifications" at column 10, lines 6-30. No where does Morrow discuss, desire, postulate or conjecture on the feature claimed my applicant of one reel dedicated to one wheel.

It is Black Letter Law the Patent and Trademark Office's burden is to establish a prima facie case of non-obviousness. The Patent and Trademark Office has met its burden only when it fully describes: "1) What the reference discloses, teaches and suggests to one skilled in the art; 2) What the reference lacks in disclosing, teaching or suggesting vis-à-vis the claimed features; 3) What particular teaching or suggestion is being relied upon either via a reference itself or knowledge of person of ordinary skill in the art; 4) A statement explaining the proposed modification in order to establish the prima facie case of obviousness; and finally 5) the motivation behind the statement of obviousness which comes from three sources: a) teachings of the prior art; b) nature of the problem to be solved; or c) knowledge of persons of ordinary skill in the art", *see In re Rouffet* 47 USPQ2d 1453 (Fed. Cir. 1998).

The Examiner has failed to meet these threshold requirements to establish prima facie obviousness. In the absence of such a prima facie showing, the Examiner's rejection cannot stand.

The Examiner has failed to find motivation for the modification to Morrow in any written form except in applicant's disclosure. This is impermissible hindsight and is tantamount to using applicant's own disclosure against applicant.

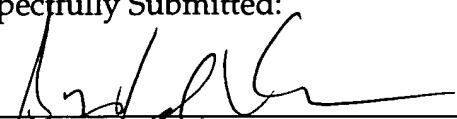
Undersigned has added two claims which multiplies a reward by 2 and divides an award by half. The Examiner could not locate the concept of an integer multiplier or fraction divider in the text. These examples are found bridging pages 12 and 13.

///

In view of the foregoing, it is respectfully requested that the Examiner pass this case to issue. If, upon further consideration, the Examiner believes further issues remain outstanding or new ones have been generated, undersigned respectfully requests that the Examiner call undersigned to expeditiously resolve same.

Dated: May 19, 2003

Respectfully Submitted:



BERNHARD KRETEN
Applicant's Attorney
Telephone (916) 930-9700
Registration No.: 27,037